UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

GEORGE GUINDON et al. Plaintiffs vs. AMERICAN FOAM CORPORATION et al. Defendants	C. A. No. 03-335-L

MOTION FOR ENLARGEMENT OF TIME

Now comes the Plaintiff MICHELLE SPENCE, by and through counsel, and moves this Honorable Court for order granting her an additional enlargement of time in which to file her memorandum of law in support of her objection to the *Motion to Dismiss* filed by Defendant Foamex International, Inc.

As grounds, counsel avers that he has just recently received Plaintiff's file from predecessor counsel, which, among other things, contains the complaint upon which the Defendant's Motion is predicated which is some 660 pages in length. Additionally, counsel learned only yesterday through inquiry with the Clerk's Office that counsel representing the other named Plaintiffs in this action filed his response to the Defendant's motion on Friday, June 18, 2004 yet failed to certify a copy of this important pleading to counsel herein.

92

Moreover, given the multiplicity of issues raised by counsel for Foamex International, counsel herein feels that additional time and consideration in preparing a response is needed, and additionally that further time will be necessary to secure sworn affidavits from one or more experts to support Plaintiff's objection to Defendant's motion.

Lastly, in light of the court's recent decision on June 15, 2004 to hear dispositive motions as they mature starting September 4, 2004, there is no prejudice to any party with the court granting the relief sought herein.

Counsel herein therefore respectfully seeks an enlargement of time from June 28 to July 15, 2004 in which to file her memorandum of law in support of her objection to Defendant's Motion to Dismiss.

Plaintiff Michelle D. Spence
By her Attorneys,

BREGGIA BOWEN & GRANDE
395 Smith Street, Providence, RI 02908
Telephone: (401) 831-1900
Facsimile: (401) 831-0129

STEPHEN E. BREGGIA, #2865

CERTIFICATION

I hereby certify that on the 23 day of June 2004 a true copy of the within was mailed to:

Thomas C. Angelone, Esq.
HODOSH, SPINELLA & ANGELONE, P.C.
One Turks Head Place, Suite 1050
Providence, RI 02903

Stephen Born, Esq.
Amy Scheeley, Esq.
LAW OFFICES OF DONALD E. GREEN
2235 Washington Street
Roxbury, MA 02119

Joseph Cavanagh, Jr., Esq.
Kristen E. Rodgers, Esq.
BLISH & CAVANAGH
30 Exchange Terrace
Providence, RI 02903

Edward M. Crane, Esq.
Deborah Solmor, Esq.
SKADDEN, ARPS, SLATE, MEAGHER & FLOM
333 West Wacker Drive
Chicago, IL 60606

Brian Cunha, Esq.
Karen A. Alegria, Esq.
BRIAN CUNHA & ASSOCIATES
904 Broadway
East Providence, RI 02914

Anthony F. DeMarco, Esq.
Mark Reynolds, Esq.
REYNOLDS, DEMARCO & BOLAND, LTD
170 Westminster Street, Suite 200
Providence, RI 02903

Gerald C. DeMaria, Esq.
James A. Ruggieri, Esq.
HIGGINS CAVANAUGH & COONEY
123 Dyer Street
Providence, RI 02903

Marc DeSisto, Esq.
DE SISTO LAW
211 Angell Street
P.O. Box 2563
Providence, RI 02906-2563

Christopher C. Fallon, Esq.
COZEN O'CONNOR
1900 Market Street
Philadelphia, PA 19103-3508

Joyce A. Faraone, Esq.
400 Reservoir Avenue, Suite 3G
Providence, RI 02907

Carl A. Henlein, Esq.
John R. Crockett, III, Esq.
Susan S. Wettle, Esq.
FROST BROWN TODD
400 West Market Street, 32nd Floor
Louisville, KY 40202-3363

Edward T. Hinckey, Esq.
Curtis R. Diedrich, Esq.
SLOANE & WALSH
3 Center Plaza
Boston, MA 02108

James Howe, Esq.
215 Broadway
Providence, RI 02903

Patrick T. Jones, Esq.
COOLEY MANION JONES, LLP
21 Custom House Street
Boston, MA 02110

Fred A. Kelly, Jr., Esq.
Randall L. Souza, Esq.
NIXON PEABODY, LLP
One Citizens Plaza, Suite 700
Providence, RI 02903

Donna M. Lamontagne, Esq.
ZIZIK, POWERS, O'CONNELL,
SPAULDING, LAMONTAGNE, P.C.
40 Westminster Street, Suite 201
Providence, RI 02903

Ronald Langlois, Esq.
Lauren D. Wilkins, Esq.
SMITH & BRINK
One State Street, Suite 400
Providence, RI 02908

Stefanie Larivee-DiMaio, Esq.
GRILLI & DIMAIO
215 Broadway
Providence, RI 02903

Faith A. LaSalle, Esq.
LAW OFFICES OF FAITH A. LASALLE
One Turks Head Place
76 Westminster Street, Suite 1010
Providence, RI 02903

James R. Lee, Esq.
Department of the Attorney General
150 South Main Street
Providence, RI 02903

Eva Marie Mancuso, Esq.
HAMEL, WAXLER, ALLEN & COLLINS
387 Atwells Avenue
Providence, RI 02909

Mark S. Mandell, Esq.
MANDELL, SCHWARTZ & BOISCLAIR
One Park Row
Providence, RI 02903

W. Thomas McGough, Jr., Esq.
James J. Restivo, Jr., Esq.
435 Sixth Avenue
Pittsburgh, PA 15219

Daniel P. McKiernan, Esq.
The Francis Building
146 Westminster Street
Providence, RI 02903

Howard Merten, Esq.
Eric M. Sommers, Esq.
VETTER & WHITE
20 Washington Place
Providence, RI 02903

Donald A. Migliori, Esq.
MOTLEY RICE
321 South Main Street, Suite 402
Providence, RI 02903

Steven A. Minicucci, Esq.
William A. Filippo, Esq.
CALVINO LAW ASSOCIATES
373 Elmwood Avenue
Providence, RI 02907

Ralph J. Monaco, Esq.
CONWAY & LONDREGAN
38 Huntington Street
P.O. Box 1351
New London, CT 06320

James T. Murphy, Esq.
Kelly N. Michels, Esq.
HANSON CURRAN, LLP
146 Westminster Street
Providence, RI 02903

Oleg Nikolyszyn, Esq.
155 South Main Street, Suite 303
Providence, RI 02903

Mark T. Nugent, Esq.
Paul Sullivan, Esq.
MORRISON, MAHONEY & MILLER
One Providence Washington
Providence, RI 02903

Robert I Reardon, Jr., Esq.
Robert I. Rimmer, Esq.
THE REARDON LAW FIRM, P.C.
Plaza 160 Hempstead Street
New London, CT 06320

Charles N. Redihan, Jr., Esq.
KIERNAN, PLUNKETT & REDIHAN
91 Friendship Street
Providence, RI 02903

James H. Reilly III, Esq.
KELLY, KELLEHER, REILLY
& SIMPSON
146 Westminster Street
Providence, RI 02903

Ronald J. Resmini, Esq.
Ronald J. Creamer, Esq.
LAW OFFICES OF RONALD J. RESMINI
155 South Main Street, Suite 400
Providence, RI 02903

William P. Robinson, III, Esq.
Stephen M. Prignano, Esq.
Stephen MacGillivray, Esq.
EDWARDS & ANGELL LLP
One Financial Plaza, Ste. 2700
Providence, RI 02903

Christopher L. Russo, Esq.
KIRSHENBAUM & KIRSHENBAUM
888 Reservoir Avenue
Cranston, RI 02910

Michael A. St. Pierre, Esq.
REVENS, REVENS & ST. PIERRE P.C.
946 Centerville Road
Warwick, RI 02886

Mark D. Tourgee, Esq.
Timothy A. Williamson, Esq.
INMAN TOURGEE & WILLIAMSON
1193 Tiogue Avenue
Coventry, RI 02816

Andrew Trevelise, Esq.
REED SMITH LLP
2500 One Liberty Place
Philadelphia, PA 19103-7301

Scott J. Tucker, Esq.
TUCKER, HEIFETZ & SALTZMAN, LLP
Three School Street
Boston, MA 02108

Max Wistow, Esq.
WISTOW & BARYLICK
61 Weybosset Street
Providence, RI 02903

Matthew E. Medeiros, Esq.
LITTLE, BULMAN, MEDEIROS
& WHITNEY
72 Pine Street
Providence, RI 02903

J. Renn Olenn, Esq.
OLENN & PENZA
530 Greenwich Avenue
Warwick, RI 02886

Brenda L. Sullivan